

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

March 11, 2024

Via Electronic Mail Only

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Nicholas A. Stobbe, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
nstobbe@postschell.com

Re: Pennsylvania Public Utility Commission
v.
Peoples Natural Gas Company LLC
Docket Nos. R-2023-3044549

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 20, in this matter.

In accordance with the discovery modifications adopted in Administrative Law Judge Long's Prehearing Conference Order issued on February 5, 2024, we request Peoples Natural Gas Company, LLC provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed.

We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Nicholas A. Stobbe, Esquire
March 11, 2024
Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

OCAPNG2023BRC@paoca.org

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

A handwritten signature in blue ink that reads "Gina L. Miller". The signature is written in a cursive style and is positioned above a horizontal line.

Gina L. Miller
Assistant Consumer Advocate
PA Attorney I.D. # 313863
GMiller@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service Only)
Certificate of Service

4866-2602-7162

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
 :
 v. : Docket Nos. R-2023-3044549
 :
 Peoples Gas Company LLC :

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate’s Interrogatories to Peoples Natural Gas Company LLC, Set 20, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission’s electronic filing system.

Dated this 11th day of March, 2024.

SERVICE BY E-MAIL ONLY

Scott B. Granger, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
sgranger@pa.gov
Counsel for I&E

Meagan Moore, Esq.
PNG Companies LLC
375 North Shore Drive, 4th Fl.
Pittsburgh, PA 15212
meagan.moore@peoples-gas.com
Counsel for Peoples Natural Gas

Steven C. Gray, Esquire
Rebecca Lyttle, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
sgray@pa.gov
relyttle@pa.gov
Counsel for OSBA

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Nicholas A. Stobbe, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
nstobbe@postschell.com
Counsel for Peoples Gas Division

SERVICE BY E-MAIL ONLY (continued)

Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas Asso.
212 Locust Street,
Suite 300
Harrisburg, PA 17101-1510
kevin@pioga.org
Counsel for PIOGA

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
*Counsel for Pennsylvania Weatherization Providers
Task Force*

Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
*Counsel for Coalition for Affordable Utility Services
and Energy Efficiency in Pennsylvania*

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
Kenneth R. Stark, Esquire
McNees Wallace & Nurick LLC
100 Pine Street, P.O. Box 1166
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
kstark@mcneeslaw.com
Counsel for Peoples Industrial Intervenors



Gina L. Miller
Assistant Consumer Advocate
PA Attorney I.D. # 313863
Gmiller@paoca.org

Aron J. Beatty
Senior Assistant Consumer Advocate
Christopher M. Andreoli
Jacob D. Guthrie
Assistant Consumer Advocates
OCAPNG2023BRC@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
717-783-5048

Dated: March 11, 2024